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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROSEN MARIANO, An individual,

Case No.: 2:18-cv-01911-APG-GWF

Plaintiff,

VS.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

THE CITY OF LAS VEGAS, a political subdivision of the State of Nevada,
CORRECTIONAL HEALTHCARE COMPANIES, INC., A Foreign Corporation,
CORRECT CARE SOLUTIONS LLC, A Foreign Limited Liability Company,
MICHELLE FREEMAN, Chief of Detention Enforcement for the City of Las Vegas,
CORRECTION OFFICER DOE 1-10,
HEALTCH CARE WORKER DOES 11-20,
DOES 21-99 inclusive, ROE CORTPORATIONS 100-199, inclusive,

Defendants.

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Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case ninety (90) days, up to and including July 29, 2019. In addition, the parties request that the deadlines for expert disclosure, rebuttal expert disclosure, joint interim status report, dispositive motions, and pretrial order also be extended as outlined herein. In support of this Stipulation and Request, the parties state as follows:

1. On November 9, 2018, Plaintiff filed his First Amended Complaint in the United States District Court, Clark County, Nevada.

2. On November 26, 2018, Defendant City of Las Vegas and Michele Freeman Answered the First Amended Complaint.

3. On January 8, 2019, Defendant Correct Care Solutions, LLC Answered the First Amended Complaint.

4. On January 10, 2019, Plaintiff served his initial document and witness disclosure.

5. On January 30, 2019, Defendant Correct Care Solutions, LLC served its initial document and witness disclosure.

DISCOVERY REMAINING

1. Defendants will take the deposition of Plaintiff.
2. The parties will complete all written discovery.
3. The Plaintiff will take the depositions of the named Defendants.
4. The parties will take the depositions of any and all other witnesses garnered through discovery.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery.

1 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

2 This Request for an extension of time is not sought for any improper purpose or other
3 purpose of delay. This request for extension is based upon the following:

4 Plaintiff's original Complaint named Correctional Healthcare Companies ("CHC") as a
5 defendant. It also named Correct Care Solutions, LLC ("CCS") as a defendant. Defendant CCS
6 conducted an investigation that revealed that the original Complaint incorrectly named CHC as
7 a party because CHC did not have the health services contract with the City of Las Vegas
8 during the relevant time period outlined in the Complaint. CCS had the relevant contract. The
9 majority of the allegations in the Complaint referred to the conduct of CHC. The parties agreed
10 that Plaintiffs would file an Amended Complaint that corrected this error and addressed the
11 relevant allegations to CCS. The current scheduling order was based on the original Complaint.
12 CCS answered the Amended Complaint on January 8, 2019. This initial investigation to identify
13 the correct parties and clean-up the pleadings caused delays in launching discovery.

14 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4
15 governs modifications or extension of the Discovery Plan and Scheduling Order. Any
16 stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be
17 made no later than twenty-one (21) days before the expiration of the subject deadline and must
18 comply fully with LR 26-4.

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1 The following is a list of the current discovery deadlines and the parties' proposed
 2 extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	April 29, 2019	Monday, July 29, 2019
Amendment to Pleadings	January 29, 2019	Closed
Interim Status Report	February 28, 2019	Wednesday, May 29, 2019
Expert Disclosure pursuant to Fed R. Civ. P. 26 (a)(2)	February 28, 2019	Wednesday, May 29, 2019
Rebuttal Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	April 1, 2019	Monday, July 1, 2019
Dispositive Motions	May 29, 2019	Tuesday, August 27, 2019
Joint Pretrial Order	June 28, 2019	Thursday, September 26, 2019

14 This Request for an extension of time is not sought for any improper purpose or other
 15 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient
 16 time to conduct discovery in this case and adequately prepare their respective cases for trial.

17 This is the first request for extension of time in this matter. The parties respectfully
 18 submit that the reasons set forth above constitute compelling reasons and good cause for the
 19 short extension.

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1 WHEREFORE, the parties respectfully request that this Court extend the discovery
2 period by ninety (90) days from the current deadline of April 29, 2019, up to and including July
3 29, 2019, and that the other remaining discovery dates also be extended as outlined in
4 accordance with the table above.

5 Dated this 13th day of February, 2019.

6 THE GALLIHER LAW FIRM

7 By: /s/ Jeffrey L. Galliher
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10 Jeffrey L. Galliher, Esq.
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13 Dated this 13th day of February, 2019.

14 LAS VEGAS CITY OF ATTORNEY'S
15 OFFICE

16 By: /s/ John A. Curtis
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*Attorneys for Defendant City of Las Vegas
and Michele Freeman*

22 **ORDER**

23 IT IS SO ORDERED.

24 Dated this 14th day of February, 2019.



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27 UNITED STATES MAGISTRATE JUDGE
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